

O C W E N
Financial Corporation

US EPA RECORDS CENTER REGION 5



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SUPERFUND PROGRAM
MANAGEMENT BRANCH

VIA FEDERAL EXPRESS

Ms. Nancy J. Justus
Superfund Program Management Branch
U.S. Environmental Protection Agency, 5HSM-12
230 South Dearborn Street
Chicago, IL 60604

RECEIVED
OCT 25 1989
TECHNICAL SUPPORT
SECTION

Re: REQUEST FOR INFORMATION PURSUANT TO SECTION 104(e) OF THE
CERCLA AND SECTION 3007 OF THE RCRA FOR THE REVERE COPPER
AND BRASS SITE IN DETROIT MICHIGAN

Dear Ms. Justus:

This is in response to the letter dated September 22, 1989 signed by Mary A. Gade and addressed to "Ocwen Financial Group" (the "Request Letter").

It is important to clarify the identity of the addressee in the Request Letter. We are unaware of an entity known as the "Ocwen Financial Group." There are two separate entities with similar names; the Ocwen Financial Corporation, a Delaware corporation ("Ocwen"), and the Oxford Financial Group, a New York limited partnership ("Oxford"). Oxford was a shareholder of Revere Copper and Brass Incorporated ("Revere") from December 1986 to June 1989. Ocwen has never been a stockholder of Revere. Revere owned Revere Copper Products, Inc. ("RCPI").

Also relevant to your inquiry is which Revere entity owned the Detroit site and during what period of time. It is my understanding that the Detroit site was owned by RCPI. In addition, it is my further understanding that RCPI sold the Detroit site to the City of Detroit around 1980. Because Oxford did not acquire its minority ownership interest in Revere until 1986, it should not bear any responsibility for the clean up of a site sold by RCPI prior to Oxford's acquisition of Revere stock. In addition, Ocwen has never owned any Revere or RCPI stock and thus is not responsible for any damage to the Detroit site.

515 North Flagler Drive
6th Floor
West Palm Beach, FL 33401
(407) 832-2221
(407) 832-9872 (Telecopier)

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The name and address of the entity that currently controls RCPI is:

Corning Glass Works
Houghton Park, E-115
Corning, New York 14831

Please do not hesitate to contact the undersigned should you have any further questions or comments regarding the foregoing.

Very truly yours,

A handwritten signature in cursive script that reads "John R. Erbey" followed by a circled "E".

John R. Erbey
Senior Vice President
and General Counsel

JRE:skf



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Company OWEN FINANCIAL CORP		Department/Floor No.		Company Superfund Program Mgmt Branch		Department/Floor No.	
Street Address 515 N FLAGLER STE 600		City WEST PALM BEACH FL		Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.) 230 South Dearborn Street		City Chicago, IL	
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